

# **EXHIBIT 2**

## Triantafyllou, Kimon (DC)

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**Subject:** FW: United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents  
**Attachments:** AA 9-15 Supplemental Priv Log Entries.xlsx

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**From:** Tavernia, Tara (DC) <[Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com)>  
**Sent:** Thursday, September 15, 2022 2:58 PM  
**To:** Moore, James (ATR) <[James.Moore4@usdoj.gov](mailto:James.Moore4@usdoj.gov)>  
**Cc:** Maltas, Allyson (DC) <[Allyson.Maltas@lw.com](mailto:Allyson.Maltas@lw.com)>; Malone, Farrell (DC) <[Farrell.Malone@lw.com](mailto:Farrell.Malone@lw.com)>; [RSchwed@Shearman.com](mailto:RSchwed@Shearman.com); [Matthew.Craner@Shearman.com](mailto:Matthew.Craner@Shearman.com); [Matt.McGee@Shearman.com](mailto:Matt.McGee@Shearman.com); [leila.siddiky@shearman.com](mailto:leila.siddiky@shearman.com); Jones, Bill (ATR) <[Bill.Jones2@usdoj.gov](mailto:Bill.Jones2@usdoj.gov)>; Riggs, Kate (ATR) <[Kate.Riggs@usdoj.gov](mailto:Kate.Riggs@usdoj.gov)>; Congdon, James (ATR) <[James.Congdon@usdoj.gov](mailto:James.Congdon@usdoj.gov)>; Storm, Brandon (ATR) <[Brandon.Storm@usdoj.gov](mailto:Brandon.Storm@usdoj.gov)>; [Arthur.durst@dc.gov](mailto:Arthur.durst@dc.gov); [THenry@oag.state.va.us](mailto:THenry@oag.state.va.us); [Liz.brady@myfloridalegal.com](mailto:Liz.brady@myfloridalegal.com); [Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov); [Robert.mcnary@doj.ca.gov](mailto:Robert.mcnary@doj.ca.gov); [Twertz@attorneygeneral.gov](mailto:Twertz@attorneygeneral.gov); [William.matlack@mass.gov](mailto:William.matlack@mass.gov)  
**Subject:** RE: United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents

Jimmy:

Further to the below, the downgraded documents were loaded to JEFS earlier today as Production Volume No. 50. The password for this production is TW&b#v<2yN. In addition, attached please find enhanced privilege log descriptions for the documents that remain withheld.

Best regards,  
Tara

**Tara Lynn Tavernia**

**LATHAM & WATKINS LLP**

555 Eleventh Street, NW | Suite 1000 | Washington, D.C. 20004-1304  
D: +1.202.637.1001 | M: +1.202.407.1665

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**From:** Tavernia, Tara (DC) <[Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com)>  
**Sent:** Wednesday, September 14, 2022 4:47 PM  
**To:** Moore, James (ATR) <[James.Moore4@usdoj.gov](mailto:James.Moore4@usdoj.gov)>  
**Cc:** Maltas, Allyson (DC) <[Allyson.Maltas@lw.com](mailto:Allyson.Maltas@lw.com)>; Malone, Farrell (DC) <[Farrell.Malone@lw.com](mailto:Farrell.Malone@lw.com)>; [RSchwed@Shearman.com](mailto:RSchwed@Shearman.com); [Matthew.Craner@Shearman.com](mailto:Matthew.Craner@Shearman.com); [Matt.McGee@Shearman.com](mailto:Matt.McGee@Shearman.com); [leila.siddiky@shearman.com](mailto:leila.siddiky@shearman.com); Jones, Bill (ATR) <[Bill.Jones2@usdoj.gov](mailto:Bill.Jones2@usdoj.gov)>; Riggs, Kate (ATR) <[Kate.Riggs@usdoj.gov](mailto:Kate.Riggs@usdoj.gov)>; Congdon, James (ATR) <[James.Congdon@usdoj.gov](mailto:James.Congdon@usdoj.gov)>; Storm, Brandon (ATR) <[Brandon.Storm@usdoj.gov](mailto:Brandon.Storm@usdoj.gov)>; [Arthur.durst@dc.gov](mailto:Arthur.durst@dc.gov); [THenry@oag.state.va.us](mailto:THenry@oag.state.va.us); [Liz.brady@myfloridalegal.com](mailto:Liz.brady@myfloridalegal.com); [Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov); [Robert.mcnary@doj.ca.gov](mailto:Robert.mcnary@doj.ca.gov); [Twertz@attorneygeneral.gov](mailto:Twertz@attorneygeneral.gov); [William.matlack@mass.gov](mailto:William.matlack@mass.gov)  
**Subject:** RE: United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents

Jimmy:

Apologies for the delayed response. Our vendor advises that the documents will be available for JEFS tomorrow morning. I'll send a note to confirm when they are posted.

Best regards,  
Tara

Tara Lynn Tavernia

**LATHAM & WATKINS LLP**

555 Eleventh Street, NW | Suite 1000 | Washington, D.C. 20004-1304  
D: +1.202.637.1001 | M: +1.202.407.1665

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**From:** Moore, James (ATR) <[James.Moore4@usdoj.gov](mailto:James.Moore4@usdoj.gov)>

**Sent:** Tuesday, September 13, 2022 5:56 PM

**To:** Tavernia, Tara (DC) <[Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com)>

**Cc:** Maltas, Allyson (DC) <[Allyson.Maltas@lw.com](mailto:Allyson.Maltas@lw.com)>; Malone, Farrell (DC) <[Farrell.Malone@lw.com](mailto:Farrell.Malone@lw.com)>;

[RSchwed@Shearman.com](mailto:RSchwed@Shearman.com); [Matthew.Craner@Shearman.com](mailto:Matthew.Craner@Shearman.com); [Matt.McGee@Shearman.com](mailto:Matt.McGee@Shearman.com);

[leila.siddiky@shearman.com](mailto:leila.siddiky@shearman.com); Jones, Bill (ATR) <[Bill.Jones2@usdoj.gov](mailto:Bill.Jones2@usdoj.gov)>; Riggs, Kate (ATR) <[Kate.Riggs@usdoj.gov](mailto:Kate.Riggs@usdoj.gov)>;

Congdon, James (ATR) <[James.Congdon@usdoj.gov](mailto:James.Congdon@usdoj.gov)>; Storm, Brandon (ATR) <[Brandon.Storm@usdoj.gov](mailto:Brandon.Storm@usdoj.gov)>;

[Arthur.durst@dc.gov](mailto:Arthur.durst@dc.gov); [THenry@oag.state.va.us](mailto:THenry@oag.state.va.us); [Liz.bradley@myfloridalegal.com](mailto:Liz.bradley@myfloridalegal.com); [Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov);

[Robert.mcnary@doj.ca.gov](mailto:Robert.mcnary@doj.ca.gov); [Twertz@attorneygeneral.gov](mailto:Twertz@attorneygeneral.gov); [William.matlack@mass.gov](mailto:William.matlack@mass.gov)

**Subject:** RE: United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents

Tara,

When does American expect to produce the documents and enhanced log descriptions that you mention below?

Thank you,

Jimmy

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**From:** [Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com) <[Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com)>

**Sent:** Wednesday, September 7, 2022 6:33 PM

**To:** Moore, James (ATR) <[James.Moore4@usdoj.gov](mailto:James.Moore4@usdoj.gov)>

**Cc:** [Allyson.Maltas@lw.com](mailto:Allyson.Maltas@lw.com); [Farrell.Malone@lw.com](mailto:Farrell.Malone@lw.com); [RSchwed@Shearman.com](mailto:RSchwed@Shearman.com); [Matthew.Craner@Shearman.com](mailto:Matthew.Craner@Shearman.com);

[Matt.McGee@Shearman.com](mailto:Matt.McGee@Shearman.com); [leila.siddiky@shearman.com](mailto:leila.siddiky@shearman.com); Jones, Bill (ATR) <[Bill.Jones2@usdoj.gov](mailto:Bill.Jones2@usdoj.gov)>; Riggs, Kate (ATR)

<[Kate.Riggs@usdoj.gov](mailto:Kate.Riggs@usdoj.gov)>; Congdon, James (ATR) <[James.Congdon@usdoj.gov](mailto:James.Congdon@usdoj.gov)>; Storm, Brandon (ATR)

<[Brandon.Storm@usdoj.gov](mailto:Brandon.Storm@usdoj.gov)>; [Arthur.durst@dc.gov](mailto:Arthur.durst@dc.gov); [THenry@oag.state.va.us](mailto:THenry@oag.state.va.us); [Liz.bradley@myfloridalegal.com](mailto:Liz.bradley@myfloridalegal.com);

[Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov); [Robert.mcnary@doj.ca.gov](mailto:Robert.mcnary@doj.ca.gov); [Twertz@attorneygeneral.gov](mailto:Twertz@attorneygeneral.gov); [William.matlack@mass.gov](mailto:William.matlack@mass.gov)

**Subject:** [EXTERNAL] RE: United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents

Jimmy:

Thank you for your letter. We have reviewed the documents that you identified in the Appendix and have concluded that some of the documents can be produced in whole or in part, and we will endeavor to send these documents by early next week. Other documents are clearly privileged (including a number of documents from your list that pre-date the NEA by several years and involve unrelated topics), and we will provide enhanced log descriptions of these documents where possible.

Best regards,

Tara

Tara Lynn Tavernia

**LATHAM & WATKINS LLP**

555 Eleventh Street, NW | Suite 1000 | Washington, D.C. 20004-1304  
D: +1.202.637.1001 | M: +1.202.407.1665

**From:** Moore, James (ATR) <[James.Moore4@usdoj.gov](mailto:James.Moore4@usdoj.gov)>

**Sent:** Friday, September 2, 2022 6:45 PM

**To:** Tavernia, Tara (DC) <[Tara.Tavernia@lw.com](mailto:Tara.Tavernia@lw.com)>

**Cc:** Maltas, Allyson (DC) <[Allyson.Maltas@lw.com](mailto:Allyson.Maltas@lw.com)>; Malone, Farrell (DC) <[Farrell.Malone@lw.com](mailto:Farrell.Malone@lw.com)>; [RSchwed@Shearman.com](mailto:RSchwed@Shearman.com); [Matthew.Craner@Shearman.com](mailto:Matthew.Craner@Shearman.com); [Matt.McGee@Shearman.com](mailto:Matt.McGee@Shearman.com); [leila.siddiky@shearman.com](mailto:leila.siddiky@shearman.com); Jones, Bill (ATR) <[Bill.Jones2@usdoj.gov](mailto:Bill.Jones2@usdoj.gov)>; Riggs, Kate (ATR) <[Kate.Riggs@usdoj.gov](mailto:Kate.Riggs@usdoj.gov)>; Congdon, James (ATR) <[James.Congdon@usdoj.gov](mailto:James.Congdon@usdoj.gov)>; Storm, Brandon (ATR) <[Brandon.Storm@usdoj.gov](mailto:Brandon.Storm@usdoj.gov)>; [Arthur.durst@dc.gov](mailto:Arthur.durst@dc.gov); [THenry@oag.state.va.us](mailto:THenry@oag.state.va.us); [Liz.brady@myfloridalegal.com](mailto:Liz.brady@myfloridalegal.com); [Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov); [Robert.mcnary@doj.ca.gov](mailto:Robert.mcnary@doj.ca.gov); [Twertz@attorneygeneral.gov](mailto:Twertz@attorneygeneral.gov); [William.matlack@mass.gov](mailto:William.matlack@mass.gov)

**Subject:** United States et al. v. American Airlines Group Inc. et al. - Withheld or Redacted Documents

Tara,

Please see the attached correspondence.

Have a good weekend.

Best,  
Jimmy

**James L. Moore**

Trial Attorney

Transportation, Energy, and Agriculture Section

U.S. Department of Justice, Antitrust Division

Mobile: (202) 805-8413

[james.moore4@usdoj.gov](mailto:james.moore4@usdoj.gov)

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American Airlines Group Inc. Replacement Log Entries

United States of America, et al. v. American Airlines Group Inc. and JetBlue Airways Corporation, 1:21-cv-11558-LTS (D. Mass.)

Highly Confidential

Privilege Log Number	Privilege Log Begin Attach Number	Privilege Log End Attach Number	Production Begin Bates	Production End Bates	Production Begin Attach Bates	Production End Attach Bates	Date
Priv_03577	Priv_03577	Priv_03578					7/18/2020
Priv_03917	Priv_03917	Priv_03917					10/15/2018
Priv_03931	Priv_03931	Priv_03931					10/15/2018
Priv_08050	Priv_08050	Priv_08050					7/6/2020
Priv_08126	Priv_08126	Priv_08126					7/6/2020
Priv_08197	Priv_08194	Priv_08198					5/29/2019
Priv_08938	Priv_08938	Priv_08938					7/10/2020

Priv_08946	Priv_08946	Priv_08946					7/10/2020
Priv_09723	Priv_09723	Priv_09723					6/2/2020
Priv_09768	Priv_09768	Priv_09768					6/2/2020
Priv_10366	Priv_10366	Priv_10366					6/25/2020
Priv_10683	Priv_10683	Priv_10683					6/1/2020
Priv_10776	Priv_10776	Priv_10776					5/28/2020
Priv_12039	Priv_12039	Priv_12039					7/23/2020

From	To	CC	BCC	Author	Email Subject
Anmol Bhargava	Farrell Malone ESQ ; Gustavo E. Bamberger; James Kaleigh ESQ ; Mark Israel; Maya Meidan; Michael Egge ESQ ; Molly Wilkinson; Robert Wark ESQ				Project Garland - MGIA model
Molly Wilkinson	Stephen Johnson	Anmol Bhargava; Anna Rathbun ESQ ; Bruce Wark ESQ ; Dan Wall ESQ ; Farrell Malone ESQ ; Gustavo E. Bamberger; James Kaleigh ESQ ; Joseph I. Mohan; Mark Israel; Mark Moessner; Michael Egge ESQ ; Mo Garfinkle; Nathan J. Gatten; Paul Denis ESQ ; Paul Jones; Robert			Re: Privileged Re: Alliances All-Hands Meeting
Bruce Wark ESQ	Stephen Johnson	Anmol Bhargava; Anna Rathbun ESQ ; Dan Wall ESQ ; Farrell Malone ESQ ; Gustavo E. Bamberger; James Kaleigh ESQ ; Joseph I. Mohan; Mark Israel; Mark Moessner; Michael Egge ESQ ; Mo Garfinkle; Molly Wilkinson; Nathan J. Gatten; Paul Denis ESQ ; Paul Jones;			Re: Privileged Re: Alliances All-Hands Meeting
Stephen Johnson	Dan Wall ESQ	Andrew Paik ESQ ; Farrell Malone ESQ ; Gustavo E. Bamberger; James Kaleigh ESQ ; Mark Israel; Maya Meidan; Michael Egge ESQ ; Priya Aiyar ESQ ; Robert Wark ESQ ; Tara Tavernia ESQ ; Vasu Raja			Re: Project Garland - Privileged and Confidential
Dan Wall ESQ	Farrell Malone ESQ ; James Kaleigh ESQ ; Priya Aiyar ESQ ; Robert Wark ESQ ; Stephen Johnson; Vasu Raja	Andrew Paik ESQ ; Gustavo E. Bamberger; Mark Israel; Maya Meidan; Michael Egge ESQ ; Tara Tavernia ESQ			RE: Project Garland - Privileged and Confidential
Paul Reynolds	Alexandra Luchian ESQ ; Brent Alex; Bruce Wark ESQ ; Glenn Martin; James Kaleigh ESQ ; Jean Paul Poitras ESQ ; Jonathan Parker ESQ ; Mo Garfinkle; Molly Wilkinson; Nathan J. Gatten; Oliver Browne ESQ ; Robert Wirick	CLProjectATIIVEUR@compasslexecon.com; Mark Israel; Miguel de la Mano			Updated slide deck on state of UK competition
Dan Wall ESQ	Andrew Paik ESQ ; Anthony R. Klein ESQ ; Farrell Malone ESQ ; James Kaleigh ESQ ; Mark Israel; Michael Egge ESQ ; Molly Wilkinson; Nathan J. Gatten; Robert Wark ESQ ; Vasu Raja				RE: Latest DOJ Deck - Privileged & Confidential

Robert Land	Dan Wall ESQ ; Farrell Malone ESQ ; James Kaleigh ESQ ; Mark Israel; Michael Egge ESQ ; Molly Wilkinson; Nathan J. Gatten; Robert Land; Robert Wark ESQ ; Scott Laurence; Vasu Raja	Christine Aylor; Joi Plummer; Mariefrance Guerrero; Marilyn Reynolds			Re: AA/B6 Call
Seung Paik ESQ	Anmol Bhargava; Bruce Wark ESQ ; Chad Schweinzger; Farrell Malone ESQ ; James Kaleigh ESQ ; Jordan J. Pack; Mark Israel; Matthew McElfresh				Garland - [Redacted]
Seung Paik ESQ	Anmol Bhargava; Bruce Wark ESQ ; Chad Schweinzger; Farrell Malone ESQ ; James Kaleigh ESQ ; Jordan J. Pack; Mark Israel; Matthew McElfresh; Seung Paik ESQ				Garland - [Redacted]
Jordan J. Pack	Gustavo E. Bamberger; Mark Israel; Maya Meidan	Chad Schweinzger; Farrell Malone ESQ ; James Kaleigh ESQ ; Seung Paik ESQ ; Tara Tavernia ESQ			RE: Project Garland: Follow-Up Requests for Slides
Jordan J. Pack	Chad Schweinzger; James Kaleigh ESQ				RE: Privileged and Confidential - Future Network Plans
Jordan J. Pack	Chad Schweinzger	Anmol Bhargava; Farrell Malone ESQ ; James Kaleigh ESQ			RE: Notes from Meeting - Garland - Privileged and Confidential
Mark Israel	Gustavo Bamberger; James Kaleigh ESQ	Anmol Bhargava; Chad Schweinzger; Dan Wall ESQ ; Deborah Davis ESQ ; Farrell Malone ESQ ; Jordan J. Pack; Matthew McElfresh; Robert Wark ESQ			RE: Garland Raven Modeling



Filename	Type of Document	Custodian(s)	Privilege Log Category	Name of Attorney	Withhold/Redact
00000000933753FA469D6E42814D906042DDED BA848B2300.msg	Microsoft Outlook Message Mail	Bhargava, Anmol	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation for July 21, 2020 meeting with the U.S. Department of Justice regarding the MGIA.	Robert Bruce Wark ESQ	Privileged-Withhold
00000000206C599C5B336341970BFFDC407016 4004092400.msg	Microsoft Outlook Message Mail	Bhargava, Anmol	Communication with outside counsel and outside economist for the purpose of obtaining legal advice regarding regulatory matters related to American Airlines alliances (unrelated to the NEA).	American In-house Legal Department	Privileged-Withhold
00000000206C599C5B336341970BFFDC407016 4084FC2400.msg	Microsoft Outlook Message Mail	Bhargava, Anmol	Communication with outside counsel and outside economist for the purpose of obtaining legal advice regarding regulatory matters related to American Airlines alliances (unrelated to the NEA).	American In-house Legal Department	Privileged-Withhold
00000000B3D54118C009314C8DF30AB14C3385 E924553500.msg	Microsoft Outlook Message Mail	Raja, Vasu	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation for July 15, 2020 meeting with the U.S. Department of Justice regarding the NEA.	American In-house Legal Department	Privileged-Withhold
00000000FC463FF3E13EEB418EBDE987C43B46F 904C72200.msg	Microsoft Outlook Message Mail	Raja, Vasu	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation for July 15, 2020 meeting with the U.S. Department of Justice regarding the NEA.	American In-house Legal Department	Privileged-Withhold
Updated slide deck on state of UK competition.msg	Microsoft Outlook Message Mail	Raja, Vasu	Communication with outside counsel and economists regarding legal advice concerning contents of regulatory submission to UK Department for Transportation and UK CMA.	American In-house Legal Department	Privileged-Withhold
00000000FDC89909C1A546409A2ADC912DE5CE 1CC41E2200.msg	Microsoft Outlook Message Mail	Raja, Vasu	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation for July 15, 2020 meeting with the U.S. Department of Justice regarding the NEA.	American In-house Legal Department	Privileged-Withhold

00000000FDC89909C1A546409A2ADC912DE5CE1C046A2200.msg	Microsoft Outlook Message Mail	Raja, Vasu	Common interest communication regarding legal strategy related to DOJ review of the NEA.	American In-house Legal Department	Privileged-Withhold
000000009299A8D0F8E9A545A8F3BE2E7E939FF2E4F72300.msg	Outlook Appointment	McElfresh, Matthew; Bhargava, Anmol; Pack, Jordan; Schweinzger, Chad	Communication regarding meeting with outside counsel and outside economists regarding legal strategy related to regulatory review of the NEA.	American In-house Legal Department	Privileged-Withhold
000000009299A8D0F8E9A545A8F3BE2E7E939FF224142200.msg	Outlook Appointment	McElfresh, Matthew; Bhargava, Anmol; Pack, Jordan; Schweinzger, Chad	Communication regarding meeting with outside counsel and outside economists regarding legal strategy related to regulatory review of the NEA.	American In-house Legal Department	Privileged-Withhold
000000009299A8D0F8E9A545A8F3BE2E7E939FF224472300.msg	Microsoft Outlook Message Mail	Pack, Jordan; Schweinzger, Chad	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation for July 15, 2020 meeting with the U.S. Department of Justice regarding the NEA.	James Kaleigh ESQ	Privileged-Withhold
000000009299A8D0F8E9A545A8F3BE2E7E939FF244042400.msg	Microsoft Outlook Message Mail	Pack, Jordan; Schweinzger, Chad	Communication with J. Kaleigh (in-house American Airlines attorney) regarding data request in connection with regulatory review of the NEA and request for outside counsel to review same.	James Kaleigh ESQ	Privileged-Withhold
000000009299A8D0F8E9A545A8F3BE2E7E939FF264312400.msg	Microsoft Outlook Message Mail	Bhargava, Anmol; Pack, Jordan; Schweinzger, Chad	Communication with outside counsel and outside economists reflecting legal advice regarding content of draft of presentation regarding the NEA.	James Kaleigh ESQ	Privileged-Withhold
0000000033F8F72F7295184CA7E22FD030F9A910C4C02100.msg	Microsoft Outlook Message Mail	McElfresh, Matthew; Bhargava, Anmol; Pack, Jordan; Schweinzger, Chad	Communication with outside counsel and outside economists regarding legal strategy related to regulatory review of the NEA.	American In-house Legal Department	Privileged-Withhold

Privilege Basis
Attorney Client
Attorney Client; Common Interest
Attorney Client; Common Interest
Attorney Client
Attorney Client
Attorney Client; Common Interest
Attorney Client

